

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY**

In re: )  
MaryAnn Wallace ) Chapter 13  
Debtor(s). ) Case No. 2216445 (SLM)  
 )  
 )  
 )  
 )

**DEBTOR'S MOTION FOR POST-PETITION FINANCING**

Debtor files the forgoing Motion for Post-Petition Financing, through her attorney, and avers the following:

1. Debtor, MaryAnn Wallace, owns and resides at 21 Hibernia Road, Rockaway NJ 07866.
2. The Statebridge Company has a mortgage on the subject property. Statebridge has a lis pendens against the property because of a pending foreclosure.
3. Statebridge filed a total debt claim, Proof of Claim no 8, for \$179,605.35.
4. Valley Bank has agreed to refinance the subject property to pay off Statebridge.
5. As stated in Debtor's certification, Valley Bank will finance \$130,000 at 9.375%. The monthly payment will be \$1201.18. Debtor will use cash to pay the remainder.
6. The refinance is in the best interest of the creditors, as Statebridge and the unsecured creditors will be paid 100%.

Dated: 4/18/24

/s/ Michelle Lee, Esq  
Dilworth Paxson LLP  
By: Michelle Lee Esq.  
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